

ANTHONY SCORDO, ESQ., PC
024591987
1425 POMPTON AVENUE, SUITE 2-2
CEDAR GROVE, NJ 07009
(973) 837-1861
Attorney for Appellants, John & Rosemary Walsh

In Re: : **UNITED STATES BANKRUPTCY COURT**
: **OF NEW JERSEY**
:
JOHN MICHAEL WALSH and :
ROSEMARY JOANNE WALSH :
:
:
FIDELITY NATIONAL TITLE : Judge: Hon. Kathryn C. Ferguson
INSURANCE COMPANY, : Chapter 7
Plaintiff :
:
:
v. : Bankruptcy Case No.: 19-13567-KCF
:
:
JOHN MICHAEL WALSH aka : Adv. No.: 19-01970
JOHN M. WALSHJ aka JOHN :
WALSH and ROSEMARY :
JOANNE WALSH aka : **NOTICE OF MOTION TO EXTEND TIME**
ROSEMARY EATON WALSH : **TO FILE NOTICES OF APPEAL PURSUANT**
aka ROSEMARY J. EATON : **TO FRSB RULE 8002**
WALSH aka ROSEMARY :
JOANNE EATON WALSH :
Defendants :
:
:

In Re: : **UNITED STATES BANKRUPTCY COURT**
: **OF NEW JERSEY**
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JOHN MICHAEL WALSH and :
ROSEMARY JOANNE WALSH :
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CHICAGO TITLE INSURANCE : Judge: Hon. Kathryn C. Ferguson
COMPANY, : Chapter 7
Plaintiff :
:
:
v. : Bankruptcy Case No.: 19-13567-KCF
:
:
ROSEMARY JOANNE WALSH : Adv. No.: 19-01971
aka ROSEMARY EATON WALSH : **NOTICE OF MOTION TO EXTEND TIME**
aka ROSEMARY J. EATON : **TO FILE NOTICES OF APPEAL PURSUANT**
WALSH aka ROSEMARY : **TO FRBP RULE 8002**
JOANNE EATON WALSH :
Defendants :
:
:

To: Christopher J. Balala, Esq.
Fidelity National Law Group
105 Eisenhower Parkway, Suite 103
Roseland New Jersey 07470
Attorney for Appellee Fidelity National Title Insurance Company

PLEASE TAKE NOTICE that the undersigned hereby moves before the United States Bankruptcy Court, District of New Jersey for an Order granting a two (2) week extension to file a Notice of Appeal from monetary judgment rendered in both of the captioned matters on November 17, 2020. I shall rely upon the attached certification of counsel.

Dated: 12/3/2020

s/Anthony Scordo
Anthony Scordo, Esq., PC
Attorney for Appellants John and Rosemary Walsh

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	:	Judge: Hon. Kathryn C. Ferguson
FIDELITY NATIONAL TITLE	:	
INSURANCE COMPANY,	:	Chapter 7
Plaintiff	:	
	:	
	:	Bankruptcy Case No.: 19-13567-KCF
v.	:	
	:	Adv. No.: 19-01970
JOHN MICHAEL WALSH aka	:	
JOHN M. WALSHJ aka JOHN	:	
WALSH and ROSEMARY	:	
JOANNE WALSH aka	:	CERTIFICATION IN SUPPORT
	:	OF MOTION TO EXTEND TIME
ROSEMARY EATON WALSH	:	TO FILE NOTICES OF APPEAL
aka ROSEMARY J. EATON	:	PURSUANT TO FRBP RULE 8002
WALSH aka ROSEMARY	:	
JOANNE EATON WALSH	:	
Defendants	:	

In Re:	:	UNITED STATES BANKRUPTCY COURT
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JOHN MICHAEL WALSH and :	:	
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	:	Judge: Hon. Kathryn C. Ferguson
CHICAGO TITLE INSURANCE	:	
COMPANY,	:	Chapter 7
Plaintiff :	:	
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	:	Bankruptcy Case No.: 19-13567-KCF
v.	:	
	:	Adv. No.: 19-01971
ROSEMARY JOANNE WALSH	:	
aka ROSEMARY EATON WALSH	:	CERTIFICATION IN SUPPORT
aka ROSEMARY J. EATON	:	OF MOTION TO EXTEND TIME
WALSH aka ROSEMARY	:	TO FILE NOTICES OF APPEAL
JOANNE EATON WALSH	:	PURSUANT TO FRBP RULE 8002
Defendants	:	

I, Anthony Scordo, certify as follows:

1. I am an attorney at law of the State of New Jersey, represent the Debtors John and Rosemary Walsh in the above entitled action and I am fully familiar with the facts set forth herein.

2. Monetary judgment was entered November 17, 2020 for purported failure to comply with discovery and failure to pay sanctions previously imposed. The relief sought in plaintiffs' motion was for suppression of Answer and additional sanctions and did not specifically seek entry of judgment.

3. I have been involved in preparing an extensive brief and appendix in the Superior Court Appellate Division in a matter captioned Mamo v. Mandeng. A-2898-19 with a hard deadline of December 1, 2020. That submission has been filed though there remain some issues as to mandatory revisions required by the Clerk of that court under another short deadline. The Thanksgiving holidays took place in the interim.

4. Defendants already have an appeal of an order of this court pending in the District Court in the matter captioned with docket number 19-01970 for this court's denial of defendants' request for extension of discovery and opportunity to depose a representative of plaintiff. The matter is docketed 3:20-cv-1161 BRM.

5. I have not had the opportunity to conduct an extensive analysis of the merits of the appeal of this judgment and have not yet discussed it with the clients at length. I am also not certain if I can amend the pending appeal in 19-01970 to include this judgment or need to file another appeal and intend to seek permission from Judge Martinotti who was assigned the first appeal. I would request an additional fourteen (14) days to file. There is also the issue of whether they can afford the filing fee or need to proceed *in forma pauperis* which I have not had the opportunity to broach.

6. I certify the above statements are true. I realize if the above statements are willfully false, I am subject to punishment.

Dated: 12/3/2020

s/Anthony Scordo
Anthony Scordo, Esq.
Attorney for Appellants' John and Rosemary Walsh

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JOHN MICHEAL WALSH and	:	
ROSEMARY JOANNE WALSH	:	Case No.
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	:	Judge: Hon. Kathryn C. Ferguson
FIDELITY NATIONAL TITLE	:	
INSURANCE COMPANY,	:	Chapter 7
Plaintiffs/Appellees	:	
	:	
	:	Bankruptcy Case No.: 19-13567-KCF
v.	:	
	:	Adv. No.: 19-01970
JOHN MICHAEL WALSH aka	:	
JOHN M. WALSHJ aka JOHN	:	
WALSH and ROSEMARY	:	
JOANNE WALSH aka	:	
ROSEMARY EATON WALSH	:	
aka ROSEMARY J. EATON	:	
WALSH aka ROSEMARY	:	
JOANNE EATON WALSH	:	ORDER
Defendants	:	

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CHICAGO TITLE INSURANCE	:	
COMPANY,	:	Chapter 7
Plaintiff	:	
	:	
	:	Bankruptcy Case No.: 19-13567-KCF
v.	:	
	:	Adv. No.: 19-01971
ROSEMARY JOANNE WALSH	:	
aka ROSEMARY EATON WALSH	:	
aka ROSEMARY J. EATON	:	ORDER
WALSH aka ROSEMARY	:	
JOANNE EATON WALSH	:	
Defendants	:	

The relief set forth on the following pages is ORDERED:

Defendants time to file notice of appeal of monetary judgment entered November 19, 2020 is extended until _____

Hon. Kathryn C. Ferguson, U.S.B.J.